

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

MDL No. 2804

This document relates to:

Master Docket No.
1:17-MD-02804-DAP
Hon. Judge Dan A. Polster

1:18-op-45405-DAP
1:18-op-45268-DAP
1:18-op-46327-DAP
1:19-op-45459-DAP

NOTICE OF EXPERTS UPON WHOM NAS PLAINTIFFS WILL OFFER AS PER DOCKET
NUMBER 2738 IN SUPPORT OF CLASS CERTIFICATION

1. Dr. Vyvyan Howard: Dr. Howard is a toxicologist who will opine of the causal link serious latent diseases and in utero exposure to opioids. He will rely upon Defendant documents, published medical literature and the preliminary reports of consulting expert Dr. Sunny Annand and Dr. Christopher Busby. Dr. Howard's Curriculum Vitae and preliminary reports are attached. Dr. Howard will issue a Declaration in Support of Class Certification and will sit for deposition.

2. Dr. Carl Werntz: Dr. Werntz practices occupational and environmental medicine in Morgantown, West Virginia. He will opine on the necessity, structure and methodology for the design and implementation of a medical monitoring program for those exposed in utero to opioids which will provide diagnostic procedures and epidemiologic surveillance. He will rely on Defendant documents, government documents, published medical literature, the reports of co-expert witness Dr. Vyvan Howard and the reports of Dr. Sunny Annan, Dr. Christopher Busby, and Dr. Carla Saunders. Dr. Werntz's CV and preliminary reports are attached. Dr. Werntz will issue a Declaration in Support of Class Certification and will sit for a deposition.

3. Dr. Harvey Rosen: Dr. Rosen is an economist from Cleveland. He will opine on the implementation and cost of the medical monitoring program described by Dr. Werntz. He will rely on Defendant documents, government documents, published literature and the report of Dr. Werntz. Dr. Rosen will issue a Declaration in Support of Class Certification and will sit for a deposition.

/s/ Celeste Brustowicz
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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of October 2019, a copy of the above and foregoing has been electronically filed with the Clerk of Court using the CM/ECF system, which provides an electronic service notification to all counsel of record registered as CM/ECF users.

/s/ CELESTE BRUSTOWICZ